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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOHN BUCKLEY,
Plaintiff,
v.
ANDREW SAUL,
Commissioner of Social Security,
Defendant.
Case No.: 2:20-cv-01724-VCF
MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S
MOTION FOR REVERSAL AND/OR
REMAND (FIRST REQUEST)

Defendant Andrew Saul, Commissioner of Social Security (“Defendant”) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff’s Motion for Reversal and/or Remand (Motion) by 14 days, from June 23, 2021 to July 7, 2021. This is Defendant’s first request for an extension to respond to Plaintiff’s Motion and fourth request in this case. Defendant respectfully requests this additional time because counsel has six other briefs due within the next month and is responsible for reviewing the briefs of a new attorney. Additionally, counsel wants time to confer

1 about settlement. If the case cannot be settled, then Defendant's counsel will draft the responsive
2 brief. Counsel contacted Plaintiff on June 21, 2021 regarding a 7-day extension and Plaintiff objected
3 to Defendant's request. Defendant's counsel is now asking for 14 days because she wants to confer
4 about settlement and if the matter cannot be settled, she will need the additional time.

5 This request is made in good faith with no intention to unduly delay the proceedings.

6 Counsel apologizes to the Court for any inconvenience caused by this delay.

7 Respectfully submitted this June 22, 2021.

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10 CHRISTOPHER CHIOU
Acting United States Attorney

11
12 */s/ Chantal R. Jenkins*
13 CHANTAL R. JENKINS
14 Special Assistant United States Attorney

15 OF COUNSEL:

16 DEBORAL LEE STACHEL
17 Regional Chief Counsel, Region IX

20 No further extensions will be granted.

21 IT IS SO ORDERED:


22
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: 6-22-2021
25

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of MOTION FOR EXTENSION OF TIME through regular U.S. mail:

John Buckley
9501 Canyon Hollow Avenue
Las Vegas, NV 89149

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 22, 2021

/s/ Chantal R. Jenkins
CHANTAL R. JENKINS
Special Assistant United States Attorney